



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 29, 2024

FILED UNDER SEAL

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
United States District Courthouse
40 Foley Square
New York, New York 10007

Re: *In re Grand Jury Subpoena Dated February 23, 2024, 24 Misc. 104 (JMF)*

Dear Judge Furman:

The Government writes in response to the Court's Order to Show Cause dated March 26, 2024. The parties have conferred, and attached to this letter are proposed redactions to the various filings, orders, and opinions in this case. The proposed redactions are marked in yellow. The Government further proposes that the two attachments to the Government's initial motion be filed under seal in their entirety. In proposing these redactions, the parties have attempted to remove any factual references that, alone or in combination, could allow a viewer of the public docket to identify the subject matter of the subpoena.

If the redactions are acceptable to the Court, the parties can file redacted versions of each of their submissions on the public docket.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Kevin Mead
Dina McLeod
Kevin Mead
Assistant United States Attorneys
(212) 637-2211/1040

cc: Alyssa D. Bell and Michael V. Schafler, Esq. (by email)